

Fell, Karen

From: Pabst, Douglas <Pabst.Douglas@epa.gov>
Sent: Monday, February 22, 2016 12:57 PM
To: Fell, Karen; Gardner, Patricia; Willis, Sarah; Krietzman, Sandy
Cc: Anderson, Arlene
Subject: LCR Oversight Framework Jan 18 2016.docx
Attachments: LCR Oversight Framework Jan 18 2016.docx.pdf; ATT00001.txt

Hi Karen, Patricia, and Sandy,

>

> Here are the questions that we discussed to understand how NJ is implementing the Lead and Copper rule. We would like to get answers at your earliest convenience and are available discuss. We also want to finalize the list of Lead ALE PWSS this week. We're looking forward to meeting in near future to discuss this and other drinking water issues.

>

> Tx Doug

Source/Treatment Change:

- Please provide the state's change in source water or treatment process, including actions the public water system needs to take and documentation provided before, during and after.
 - Is there written documentation of this decision between the primacy agency and the PWS?
 - What documentation does the primacy agency request of the PWS before making this change?
 - Does the primacy agency evaluate or require evaluation of potential impacts from the change?
- How does the response above change when implementing LCR requirements for consecutive distribution systems?
 - Describe the combined sampling plan. When the wholesaler exceeds ALE, is PE required for the wholesaler and all the consecutive systems?
 - How is the primacy agency establishing WQP for the PWSs in a combined distribution system?

Sampling Plan:

- What is the primacy agency protocol for sampling? Does the primacy agency -have any regulation or policy that addresses pre-stagnation flushing? If so, what is it? Did the primacy agency approve initial plans and what process is used for systems to notify states and states to review any modifications to sampling plans.
- What protocol does the primacy agency use to review sampling locations and ensure the sites meet the highest Tier classification possible? What type of documentation did the State review, if any, to confirm Tier 1 sampling sites identified by the PWS? Does the state require sampling plans to be submitted to the state? What do those plans contain (site locations, sampling schedule, sampling instructions, etc.)
- How often does the primacy agency review sampling plans? Does the primacy agency require approval of sampling plan?
- Does the state require that systems submit sampling instructions, especially if samples are being collected by customers?
- What guidance does the primacy agency provide regarding sampling pools and retaining samples in the initial monitoring pool vs. new sites? What protocol does the primacy agency provide to PWS in regards to changing or "dropping" sites?
- What actions do states take if a system removes a site from their sampling pool that had tested high in previous monitoring periods?
- Has the primacy agency approved systems on reduced monitoring to take their samples during different than the required months of June-September?

Invalidation of Samples:

- What criteria does the state use to invalidate samples? What documentation is required of public water systems to make this decision?
- Does the primacy agency keep a record of written justifications for invalidated samples?

Monitoring Waivers for Small Systems

- Is the primacy agency approving waivers for lead sampling?
- If so, what is the protocol for such waivers to be approved?

Public Education & Outreach

- Describe, if anything, what the state requires over and above the Federal LCR requirements for public education, sampling instructions to homeowners or consumer notification to homeowners who sampled?
- What kind of resources does the state invest in the voluntary effort of taking any actions when an individual home sample is higher than the action level and if so, what actions are taken?
- What does the state do when a complaint is received with sample results they have taken and the number is higher than the AL number? What is the state protocol for addressing citizen complaints?
- Describe any mechanisms by which the primacy agency coordinates with children's health programs that track elevated blood lead levels?

Others:

- What information on LCR is posted on the web or otherwise made available to the public, such as sampling protocols, sampling instructions, lead service line locations, or individual sample results?
- What additional steps does the state or public water system take to inform the public, such as press release, press conference, etc?
- Are there PWSs of concern in the state? What steps are being taken to provide assistance?

Questions related to systems with ALEs:

- What follow-up action(s) was taken by the public water system?
- If system had corrosion control, did state look at re-optimization? If not currently in place – was it now required?
- Does the state enter PE violations into SDWIS if a PWS fails to issue PE or fails to do it timely?
 - *If a PWS did not do PE within 60 days, it would be a violation and if that is entered into SDWIS by the state, we can get that information directly from SDWIS rather than asking the states to go back and do a file review to get the exact date, unless the state database has this information were the individual results from homes that exceeded the AL?*
- What were the individual results from homes that exceeded the AL? Did the public water system return to standard monitoring with appropriate number of samples?
 - *Need to make sure SDWIS can handle the results and need to decide how we pick a number of PWSs per state to look at.*
- Did the public water system certify that they notified homeowners with lead results?
- Sample of instructions provided to homeowners.